



Christine Jines  
Director -  
Federal Regulatory

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September 17, 1999

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RECEIVED

SEP 17 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Exparte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Dear Ms. Salas:

**Re: In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Change of Consumers Long Distance Carrier - CC Docket No. 94-129, FCC 98-334; In the Matter of Truth-in-Billing and Billing Format - CC Docket No. 98-170 FCC 99-72**

On September 15, 1999, Virginia Stephens and Lynn Arnold of Southern New England Telephone (SNET), together with Barbara Hunt and the undersigned of SBC Communications Inc. (SBC), met with David Konuch, Anita Cheng, and Mark Siefert of the Enforcement Division of the Common Carrier Bureau to discuss compliance issues with the Truth-in-Billing Order. Due to the inclement weather conditions, this exparte is being filed today.

As recently reported in the Comments of SBC Communications Inc. filed in response to the *Notice of Public Information Collection(s) Submitted to OMB for Review and Approval*, SBC is making efforts to bring its local exchange company billing systems into compliance with the Truth-in-Billing requirements. SBC reported to the FCC that SNET's billing project to allow it to identify each service provider on the bill is progressing as previously reported and that SNET will be in compliance with all of the Truth-in-Billing requirements, other than the requirement to highlight new service providers by October, 1999. In addition, SBC's other local exchange companies are working on improvements to the service descriptions on their bills. None of the SBC local exchange companies can comply with the "highlight new service providers" requirement and SBC looks forward to participating in the industry discussions to try to develop a workable alternative to that requirement.

SBC reported that Southwestern Bell Telephone Company (SWBT), Pacific Bell and Nevada Bell have begun the preparations to implement a billing change to designate the

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deniable amount on their bills in the same manner as SNET. For that reason, SBC sought guidance from the FCC that the manner in which SNET indicates the deniable total on the bill satisfies the Truth-in-Billing requirement to designate "deniable/non-deniable" charges before its other local exchange companies incur the costs to duplicate that billing method. Based upon the initial reaction that the SNET bill does comply with the Truth-in-Billing guidelines, SBC is moving forward with its efforts to implement the "deniable/non-deniable" billing change in March of 2000, although that date is a very aggressive date for completion of this billing change. When that change is completed, it is expected that all of the SBC local exchange companies should be in compliance with all of the Truth-in-Billing requirements, with the exception of the "highlight new service provider" requirement. SBC indicated that, if FCC staff, upon further reflection and study of the attached sample bill, determines that the method used by SNET to designate deniable charges does not meet the requirement of the Truth-in-Billing Order, SBC would greatly appreciate notification of that determination.

SBC also requested guidance as to whether the "separate charges by service provider" requirement is satisfied by identifying the entity that markets the services to the customer, so long as an 800 contact number is clearly displayed for that entity, that entity handles all customer inquiries on the package of services and the services that make up the package are clearly identified. Again, the Commission staff took that issue under consideration, but did note that their order was designed not as an impediment to bundling, but to provide customers full and complete explanations of all billed charges.

In accordance with 47 C.F.R. 1.1206(a)(1) of the Commission's Rules, the original of this letter and one copy are being filed with your office for inclusion in the public record. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Please direct any inquiries to the undersigned.

Sincerely,



Attachment

cc: Ms. Huth - OMB  
Mr. Konuch  
Ms. Cheng  
Mr. Siefert

**Account Summary**

Page 1

Please detach here and return with your payment. Write account number on check and make payable to SNET

## Explanation of Terms and Services

### Basic and Non-Basic Charges:

The total amount due on your telephone bill may consist of Basic and Non-Basic Charges. You are responsible for the payment of all charges on your bill. Failure to pay Basic Charges may result in disconnection of your telephone service for non-payment. Telephone service will not be disconnected for non-payment if you do not pay the Non-Basic portion of your bill. However, failure to pay any portion of your bill may result in collection action.

### Monthly Charges (basic):

- **Regulated Network Services** include telephone service to the customer premises and other services such as Totalphone® and SmartLink®.
- **FCC Line Charge** is required by the Federal Communications Commission and covers a portion of the cost to connect the customer to the long distance network.
- **Network and Data Transmission** include Special Services (circuits), the regulated portion of Packet Switched Data Networks and Centralink® Centrex Services.

### (non-basic):

- **Advertising** in the yellow and/or white page directories, electronic or other media.
- **ConnNet® and Packet Switched Data Networks** (non-regulated portion).
- **Terminal Equipment** includes all leased or rented devices such as telephones and data sets.
- **Inside Wire** contracts to maintain and repair wiring inside the customer premises without additional charge at the time of repair.
- **SNET Internet<sup>SM</sup>** access and usage charges.

### Calling Charges (basic):

- Local and long distance calls, local and long distance calling plans, WATS/800 service and calls to Directory Assistance (411) for obtaining telephone listings.

### (non-basic):

- 900 calls and calls placed through alternate operator service providers.

### Wireless (non-basic):

- All charges for wireless products and services.

### Other Charges and Credits (basic & non-basic):

- One-time charges for installations, moves and changes; one-time adjustments for items that carry a monthly rate based on the number of days from installation or removal to regular billing date. These charges may be basic or non-basic depending on the associated product or service or the payment option selected.

### Taxes (basic & non-basic):

- Most charges are subject to federal and state sales tax.

### Late Payment Information:

SNET will apply a 1% late payment charge per month on any unpaid balance. Any money we receive will be first applied to the late fee, and the balance will be applied to other charges. In order to avoid a late charge, we must receive payment in full for the total amount due on your bill statement no later than the date specified.

Page 2

We provide local



calling, in-state, out-of-state and international



long distance,



wireless, Internet



access and much more.



Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Telephone Number: 203 265-6943

R

MRS ALICE C FLORIDIA  
36 VALLEY VIEW DR  
WALLINGFORD CT

06492

Previous Charges	Payments	Adjustments	Balance	Current Charges	Total Due
\$86.32	\$86.32cr	\$0.00	\$0.00	\$78.26	\$78.26

## Account Summary

<b>Previous Charges</b>	<b>86.32</b>
Payment Received - Thank You!	86.32cr
Outstanding Balance before Current Charges	0.00
<b>Current Charges</b>	<b>78.26</b>
Monthly Charges	18.84
Discounts	11.65cr
SNET Calling Charges (before discounts)	26.16
Taxes and Surcharges	3.14
SNET Wireless (All Charges, Discounts and Taxes)	39.27
Other Long Distance Companies	2.50
<b>Total Due</b>	<b>78.26</b>

To avoid 1% late charge, please pay \$78.26 by June 12  
Basic Charges \$32.22  
(see reverse for definition)

## Questions?

Here are the toll-free numbers to call

### SNET -

Paying, Billing, Adding, or Changing Service:

**811** or **1-800-453-SNET** if calling from out of state

Repair Service:

Business: **1-203-420-3131**

Residential: **611**

### SNET Wireless Services -

Billing, Sales, Service, Lost or Stolen Phones:

Wireless Service: **1-800-922-5469**

Paging Service: **1-800-626-2636**

### Non-SNET portions of your bill -

See the top of each company's page

### Your Savings This Month

You saved **\$28.93**

this month by using your

SNET All Distance Services

**Thank You For Using SNET!**

Page 1

Please detach here and return with your payment. Write account number on check and make payable to SNET



Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Please Pay By: June 12, 1999  
Total Amount Due: \$78.26

00041900 2 AV 0.463 15

11100001100010011010000101000111010000101110000011001100100101

R46 MRS ALICE C FLORIDIA  
36 VALLEY VIEW DR  
WALLINGFORD CT

06492-1920

Amount  
Enclosed:

SNET  
PO BOX 1861  
NEW HAVEN CT 06508-0901

0501203020605694303102046200726900000000000000000000782691

**Your Service Plan**

SNET is your carrier for instate, interstate, and international calls. You currently have a preferred carrier freeze on one or more of your lines. Any change to your carrier selection would require your approval.

**Your Savings**

You saved \$8.65 this month by using your SNET All Distance Services!

Do you want to get messages when you're on the phone or on-line?  
Ask about **SNET Voice Mail** and our current offer.

## Explanation of Terms and Services

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**(non-basic):**

- **Advertising** in the yellow and/or white page directories, electronic or other media.
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**(non-basic):**

- 900 calls and calls placed through alternate operator service providers.

**Wireless (non-basic):**

- All charges for wireless products and services.

**Other Charges and Credits (basic & non-basic):**

- One-time charges for installations, moves and changes; one-time adjustments for items that carry a monthly rate based on the number of days from installation or removal to regular billing date. These charges may be basic or non-basic depending on the associated product or service or the payment option selected.

**Taxes (basic & non-basic):**

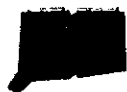
- Most charges are subject to federal and state sales tax.

**Late Payment Information:**

SNET will apply a 1% late payment charge per month on any unpaid balance. Any money we receive will be first applied to the basic charges, and the balance will be applied to other charges. In order to avoid a late charge, we must receive payment in full for the total amount due on your bill statement no later than the date specified.

**Call 1-800-890-SNET**

Make your life simpler by choosing SNET! We provide local



calling, in-state, out-of-state and international



long distance,



wireless, Internet



access and much more.



Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Telephone Number: 203 265-6943

R

Questions about your SNET bill? Call 811  
Outside Connecticut 1-800-453-SNET

## SNET All Distance®

### Information for SNET Customers

#### News

##### New Internet Price Plans

Attention SNET Internet Customers: Effective May 1, 1999, our new Internet price plans take effect. To make sure you are on the right plan, please call us at 1-800-408-8282.

##### A Hot Combination of the Best Services at One Great Price!

Save on **The WORKS**, SNET's new package of custom calling services! Get Caller ID with Name, Call Waiting, unlimited \*69 and \*66, and more for our low package rate. Call to order today!

##### SNET Toll Free 800 Service -The easy and economical way for the important people in your life to reach you

Now your residence or home-based business can have all the advantages of an 800 toll free service.

Do you have:

- Elderly parents on a fixed income?
- A child at college that calls collect?
- A spouse who travels and the surcharges add up?
- A home-based business that you'd like to have appear more professional?

**SNET Toll Free 800 Service** can meet all of these needs on a single bill. And best of all, if you're an SNET Automatic Savings Plan customer, your SNET Toll Free 800 Service rates can also be as low as 10 cents a minute because all your SNET Toll Free 800 usage counts toward your monthly discount.

To find how you can have free installation and 3 months of service free, just call 1-800-381-SNET today. Hurry, because this **offer expires May 29, 1999!**

##### CONTINUE TO DIAL 1-800-555-5321 FOR ALL U. S. CALLING CARD CALLS.

Effective June 1, 1999, Calling Card calls you make from Illinois, Indiana, Michigan, Ohio and Wisconsin will be carried by *Sprint* and/or *Pacific Bell*. When you dial 1-800-555-5321 from these states, you will continue to receive competitive rates and outstanding quality. Your calls will automatically be routed to a *Pacific Bell/Sprint* platform for completion. Due to the pending merger between SBC and Ameritech, FCC regulations require SNET to withdraw from providing long distance services in the Ameritech region. If you have an SNET toll plan, which aggregates Calling Card calls, calls originating from these states will no longer count toward your volume discount. However, you will continue to receive a single telephone bill each month with calls from these states listed on a separate page under the heading of *Sprint*.

##### All Distance Savings

You saved \$28.93 this month with your SNET All Distance Services.

These savings consist of:

\$12.92 savings automatically applied to eligible calls with your Worldwide Solutions Plan

\$4.36 savings automatically applied to eligible calls with your Simple Solutions Plan

\$2.10 discount applied as a credit with your Simple Solutions Plan

\$9.55 Discount applied as a credit with your Employee Concession

##### SNET All Distance Summary

Instate Long Distance Calls	6.58	
Out of State Long Distance Calls	14.41	
International Long Distance Calls	5.17	
Total SNET All Distance Charges	\$26.16	
<b>SNET Simple Solutions Volume Discount</b>		<b>\$2.10cr</b>

Credits are based on SNET All Distance usage of \$26.16 for your plan.



Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Telephone Number: 203 265-6943

R

Questions about your SNET bill? Call 811

## SNET All Distance®

### Notes:

In addition to your low plan rates and volume discount, SNET Simple Solutions includes one second rating\* for greater savings.

\*(A minimum conversation time applies.)

### Account Details

#### Current Charges

##### Monthly Charges

Billing Period May 13 to June 12, 1999

##### Service & Equipment

1 Calling Card - SNET All Distance - unrestricted pin	.00
1 Flat residence line	.00
1 Totalphone service	.00
1 Caller ID with Name	6.00
1 Federal Subscriber Line Charge	3.50
1 Internet Service - includes Global Service Provider Charge	6.39
1 Internet Software	.00
1 Maintenance of wire service	.00

##### Call Plans

1 Worldwide Solutions Call Plan	2.95
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##### Total Monthly Charges

18.84

#### Discounts

##### SNET Simple Solutions Summary

##### Eligible Domestic Charges:

Instate Long Distance	6.58	
Out of State Long Distance	10.15	
Out of State Calling Card	4.26	
Total Domestic Charges	\$20.99	
Discount applied at 10.000%		2.10cr

##### Eligible International Charges:

International Long Distance	5.17
Total International Charges	\$5.17

##### Employee Toll Concession

Instate	5.92cr
Out of State	3.63cr

##### Total SNET Discounts

11.65cr

#### Calling Charges

##### SNET All Distance Calls

No.	Date	Time	Place	Area-Number	Rate	Min Sec	Amount
1	Apr 13	401pm	to Spain	034981208247	OFi	22 06	4.86
2	Apr 20	440pm	to Old Saybrk	CT 860 399-4057	OPM	21 49	3.73
3	Apr 22	416pm	to Farnesbrch	TX 972 402-2700	OP	12 40	2.91
4	Apr 23	220pm	to Hartford	CT 860 947-7261	OP	1 16	.23
5	Apr 23	802pm	to Lyme	CT 860 434-9055	OF	13 51	1.38
6	Apr 24	923am	to Spain	349812700	OPi	0 30	.11
7	Apr 24	956am	to Spain	349812700	OPi	0 54	.20
8	Apr 25	428pm	to Miami	FL 305 695-8013	OF	8 33	1.11
9	Apr 27	804pm	to Orlando	FL 407 363-1142	OF	30 23	3.95





Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Telephone Number: 203 265-6943

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Questions about your SNET bill? Call 811  
Outside Connecticut 1-800-453-SNET

## SNET All Distance®

### SNET All Distance Calls Continued

No.	Date	Time	Place	Area-Number	Rate	Min Sec	Amount
1	May 1	1123am	to Dover	PA 717 292-4165	OF	16 02	2.08
2	May 1	1205pm	to Lyme	CT 860 434-9055	OF	0 28	.05
3	May 2	329pm	to Guilford	CT 203 453-5916	OF	0 20	.03
4	May 8	1218pm	to Guilford	CT 203 453-5916	OF	0 18	.03
5	May 8	413pm	to Lyme	CT 860 434-9055	OF	2 33	.25
6	May 8	449pm	to Watch Hill	RI 401 348-9700	OF	0 44	.10
7	May 11	1136am	to Hartford	CT 860 947-7225	OP	4 52	.88

### SNET All Distance Charges

21.90

### SNET All Distance Calling Card Calls

No.	Date	Time	Place	Area-Number	Rate	Min Sec	Amount
8	Apr 25	427pm	to Wallingfd	CT 203 265-6943			
			fr Miami	FL 305 695-8013	OFC	0 18	.82
9	Apr 26	149pm	to Wallingfd	CT 203 265-6943			
			fr Miami	FL 305 695-8013	OPC	0 31	.92
10	Apr 30	420pm	to Wallingfd	CT 203 265-6943			
			fr Ftlauderdl	FL 954 359-9860	OPC	5 21	2.52

### SNET All Distance Calling Card Charges

4.26

### Total SNET Calling Charges

26.16

### Taxes and Surcharges

Connecticut Sales Tax	1.88
Federal Tax	.82
Connecticut Service Fund	.05
Connecticut E 9-1-1 Surcharge - 1 Line	.39
<b>Total Taxes and Surcharges</b>	<b>3.14</b>

### Total SNET Current Charges

36.49

Services beyond Connecticut provided by SNET America, Inc.

### Rate Codes for Long Distance

May be one code or a combination of more than one code:

M Multiple Rate Period	O Optional Call Plan	P Peak
F Off-peak	C Calling Card	i International Special Rate



We go beyond the call

Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Wireless Account Number: 000043441

Questions about your SNET Wireless bill?  
For Wireless Phone Service 1-800-922-5469  
For Paging Service 1-800-626-2636

## SNET Wireless Services<sup>SM</sup>

### Information for SNET Wireless Customers

#### News

IMPORTANT BILLING INFORMATION. Due to a computer error, you may not have been billed for your SNET Wireless charges on your last Combined Bill. If so, this Combined Bill will include your wireless charges for the past two months. We apologize for any inconvenience this may cause you.

### SNET Wireless

#### Wireless Account Summary

Service and Optional Features Charges		
Monthly Charges	32.97	
Optional Features	.78	
<b>Total Monthly and Optional Feature Charges</b>		33.75

Other Charges and Credits		
Other Charges and Credits Applied to Account	.32	
<b>Total Other Charges and Credits</b>		.32

Calling Charges		
Usage Summary		
Airtime Usage	Minutes	Amount
Peak	5:00	1.50
Off-Peak	3:00	.54
Total Airtime	8:00	2.04
SNET Wireless Usage Charges		<b>2.04</b>
<b>Total SNET Wireless Calling Charges</b>		2.04

Taxes		
State Sales Taxes	2.11	
Federal Tax	1.05	
<b>Total Taxes</b>		3.16

<b>Total Account Charges</b>		<b>39.27</b>
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Other Charges and Credits		
<b>Current Bill Period</b>		
<u>Svc Date</u>		
May 07 1999 Universal Svc Fund	.32	
Current Bill Period Charges and Credits	<b>.32</b>	
<b>Total Other Charges and Credits</b>	.32	

#### Account Details

#### Wireless Phone Number 203 430-3068

##### Current Charges

Monthly Charges		
Billing Period May 8 to June 7, 1999		
Service Plan - SNET Employee Plan A	10.99	
Includes: LD USA	Roam USA	
Optional Features		
CT E911 Surcharge	.26	
Free Authentication	.00	
<b>Total Monthly and Optional Feature Charges</b>		11.25

##### Calling Charges

##### SNET Wireless Calls

No.	Date	Time	Place	Area-Number	Rate	Min	Amount
1	Apr 8	451pm	Wallingfd	CT 203 265-6943	P	2:00	.60



Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Wireless Account Number: 000043441

Questions about your SNET Wireless bill?  
For Wireless Phone Service 1-800-922-5469  
For Paging Service 1-800-626-2636

## SNET Wireless Services<sup>SM</sup>

### Wireless Phone Number 203 430-3068 Continued

#### Usage Summary

Airtime Usage	Minutes	Amount
Peak	2:00	.60
Total Airtime	2:00	.60
SNET Wireless Usage Charges		.60
<b>Total SNET Wireless Calling Charges</b>		<b>.60</b>

#### Taxes

State Sales Taxes	.70
Federal Tax	.35
<b>Total Taxes</b>	<b>1.05</b>

**Total SNET Wireless Current Charges for 203 430-3068**

**12.90**

### Wireless Phone Number 203 772-5399

#### Current Charges

##### Monthly Charges

Billing Period May 8 to June 7, 1999

Service Plan - SNET Employee Plan A

Includes: LD USA

Roam USA

10.99

##### Optional Features

CT E911 Surcharge

.26

Free Authentication

.00

**Total Monthly and Optional Feature Charges**

**11.25**

#### Calling Charges

##### SNET Wireless Calls

No.	Date	Time	Place	Area-Number	Rate	Min	Amount
1	Apr 9	821pm	Wallingfd	CT 203 265-6943	O	1:00	.18
2	Apr 10	524pm	Wallingfd	CT 203 269-6654	O	1:00	.18
3	Apr 13	519pm	Wallingfd	CT 203 265-6943	P	1:00	.30
4	Apr 16	627pm	Wallingfd	CT 203 265-6943	P	2:00	.60
5	Apr 18	1113am	Wallingfd	CT 203 265-6943	O	1:00	.18

#### Usage Summary

Airtime Usage	Minutes	Amount
Peak	3:00	.90
Off-Peak	3:00	.54
Total Airtime	6:00	1.44

SNET Wireless Usage Charges

**1.44**

**Total SNET Wireless Calling Charges**

**1.44**

#### Taxes

State Sales Taxes	.75
Federal Tax	.37
<b>Total Taxes</b>	<b>1.12</b>

**Total SNET Wireless Current Charges for 203 772-5399**

**13.81**

### Wireless Phone Number 860 303-7307

#### Current Charges

##### Monthly Charges

Billing Period May 8 to June 7, 1999

Service Plan - SNET Employee Plan A

Includes: LD USA

Roam USA

10.99



Bill Date: May 15, 2000  
Account Number: 203 265-6943 031  
Wireless Account Number: 000043441

Questions about your SNET Wireless bill?  
For Wireless Phone Service 1-800-922-5469  
For Paging Service 1-800-626-2636

## SNET Wireless Services<sup>SM</sup>

### Wireless Phone Number 860 303-7307 Continued

#### Optional Features

CT E911 Surcharge	.26	
Free Authentication	.00	
<b>Total Monthly and Optional Feature Charges</b>		<b>11.25</b>

#### Taxes

State Sales Taxes	.66	
Federal Tax	.33	
<b>Total Taxes</b>		<b>.99</b>

<b>Total SNET Wireless Current Charges for 860 303-7307</b>		<b>12.24</b>
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### Rate Codes For Wireless Calls

May be one code or a combination of more than one code:

O	Off Peak	P	Peak
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Bill Date: May 13, 1999  
Account Number: 203 265-6943 031  
Telephone Number: 203 265-6943

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Questions about your AT&T bill?  
Call 1-800-222-0300

Billing for AT&T  
Page 1



## Account Details

### Current Charges

#### Calling Charges

#### AT&T Long Distance Calls

No.	Date	Time	Place	Area-Number	Rate	Min Sec	Amount
1	Apr 2	331pm	to Wallingfd	CT 203 265-6943			
			Collect fr Payphone	CT 203 634-9458	DS	2 00	2.29
AT&T Long Distance Charges							<b>2.29</b>

#### AT&T Total Calling Charges

2.29

#### Taxes and Surcharges

Connecticut Sales Tax(6%)

.14

Federal Tax(3%)

.07

#### Total Taxes and Surcharges

.21

#### Total Current Charges for AT&T

**2.50**

### Rate Codes for Long Distance

May be one code or a combination of more than one code:

D Day

S Station